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June 15, 1993

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JUN 15 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notification of Permitted Ex Parte Presentation
MM Docket No. 92-264

Dear Ms. Searcy:

Viacom International Inc. ("Viacom"), by its attorneys and pursuant to Section 1.1206(a)(2) of the Commission's rules, hereby submits an original and one copy of this memorandum regarding a permitted ex parte presentation to the Commission's staff regarding MM Docket No 92-264.

On Tuesday, June 15, 1993, at approximately 3:30 p.m., H. Gwen Marcus and Ellen Schned, of Viacom, and Lawrence W. Secrest, III, of this office, met with Byron F. Marchant and James R. Coltharp of Commissioner Barrett's staff. The discussion related to Viacom's comments, reply comments and further reply comments filed in response to the Notice of Proposed Rule Making in MM Docket No. 92-264, FCC 92-542 (rel. December 28, 1992), which sought comment on the implementation of Sections 11 and 13 of the Cable Television Consumer Protection and Competition Act of 1992. Those provisions deal with the horizontal and vertical ownership limits, cross-ownership limitations and anti-trafficking provisions.

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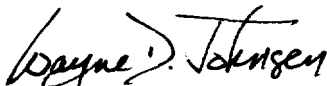
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A copy of the attached document was presented to
Messrs. Marchant and Coltharp.

Kindly direct any questions regarding this matter to
the undersigned.

Respectfully submitted,


Wayne D. Johnsen

WDJ/rr
Enclosure
cc: Byron F. Marchant
James R. Coltharp

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OFFICE OF THE SECRETARY

CHANNEL CAP ISSUES

1. Application only to the vertically integrated cable operators.
2. Grandfather existing carriage.
3. Exempt popular services (e.g., carriage on systems serving 50% of non-affiliated subscribers nationwide).
4. Exempt new services for 5 years.
5. Apply only to national services -- encourage localism.
6. Setting the cap:
 - a. All activated channels (including PEG/must carry/leased access).
 - b. Limit application to 54 channels.
 - c. No more than 50% to commonly-owned/non-exempt services.
 - d. Phase-out where effective competition exists.